



117 N. 1st Street - King City, CA 93930

Office: 831-385-1263

Fax: 831-385-3340

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John Robertson
Executive Officer and staff
Central Coast Regional Water Quality Control Board
895 Aerovista Place, Suite 101
San Luis Obispo, CA 93401

Dear Mr. Robertson and staff:

The Central Coast Regional Water Quality Control Board (Central Coast Water Board) is soliciting a multitude of detailed responses to the proposed Ag Order 4.0 options tables. There is an abundance of information such as specific numeric limits and time schedules that have been requested to be provided by the public during the comment period. The currently proposed Ag Order 4.0 options will negatively impact Central Coast growers.

Many stakeholders have joined together and worked tirelessly to develop an alternative to the Central Coast Water Board's proposed requirements. Mission Ranches supports this Central Coast Ag Alternative as presented by the Monterey County Farm Bureau and The Grower-Shipper Association. This alternative has taken into account protecting water quality as well as supporting farmers. The objectives that the Central Coast Water Board has put forth have been met by this alternative which include the following:

- a. Minimizing nitrate discharges to groundwater (Ag Alternative Program Element – Nitrates in Groundwater),
- b. Minimizing nutrient discharges to surface water (Ag Alternative Program Element – Surface Water),
- c. Minimizing toxicity in surface water from pesticide discharges (Ag Alternative Program Element – Surface Water),
- d. Protecting and restoring riparian and wetland habitat (Ag Alternative Program Element – Riparian), and
- e. Minimizing sediment discharges to surface water (Ag Alternative Program Element – Sediment & Erosion).

In addition to sharing our support of the Ag Alternative, there are a few key points that we would like to bring forward for your consideration in developing the next Ag Order:

- Several years of grower data have been collected by the Central Coast Water Board. Analysis of recent data cannot show direct correlation with historical N issues. It would be more beneficial to all stakeholders if the Central Coast Water Board would require less reporting of data so that growers could focus more energy on trying and implementing practices that can help improve water quality. Incentives for growers would be "less reporting" if we can demonstrate that we have implemented certain management practices to protect water quality.
- We have learned firsthand with the required Irrigation Nutrient Management Plan Effectiveness Reports the difficulties with A-R. N removed coefficients for all the crops grown on the Central Coast are not available. Research needs to be performed to develop coefficients for all the crops that are or potentially could be grown here. Mission Ranches is working closely with the UC Cooperative Extension System to develop N removal data. Time is needed for the UC research to advance.
- The Cooperative Monitoring Program, Central Coast Water Quality Preservation Inc, has a proven track record and should continue conducting surface water quality monitoring. This monitoring should not be done by the growers.
- Site inspections of all growers by the Central Coast Water Board are not necessary. Growers already successfully self-report to many other agencies. We do however understand that inspections may need to take place for outliers. Self-inspections of our growing sites will be sufficient.

Thank you for taking the time to read our letter and providing us with the opportunity to comment. We hope that you will consider these comments when developing Ag Order 4.0.

Sincerely,



John Romans
Mission Ranches Company, LLC



Lawrence Hinkle
Mission Ranches Company, LLC



John DeCarli
Mission Ranches Company, LLC